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*Attorneys for Debtors and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the lead case,  
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

**STIPULATION BETWEEN DEBTORS  
AND CALIFORNIA STATE AGENCIES  
EXTENDING TIME TO RESPOND TO  
BAR DATE MOTION**

Re: Dkt. No. 1784

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is  
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and  
3 debtors in possession (collectively, the “**Debtors**”), on the one hand, and California Department  
4 of Toxic Substances Control, California Department of Water Resources acting by and through  
5 the California Energy Resources Scheduling Division and on behalf of the State Water Project,  
6 State Water Resources Control Board, Regional Water Quality Control Boards, State Energy  
7 Resources Conservation and Development Commission, California Department of Forestry and  
8 Fire Protection (CAL FIRE), California Coastal Commission, California Air Resources Board,  
9 Department of Parks and Recreation, San Francisco Bay Conservation and Development  
10 Commission, Department of Housing and Community Development, Central Valley Flood  
11 Protection Board, and California Department of Fish and Wildlife (collectively, the “**California**  
12 **State Agencies**”), on the other hand. The Debtors and the California State Agencies are referred  
13 to in this Stipulation and Agreement for Order collectively as the “**Parties**,” and each as a  
14 “**Party**.” The Parties hereby stipulate and agree as follows:

15 **RECITALS**

16 A. On May 1, 2019, the Debtors filed the *Motion of Debtors Pursuant to 11 U.S.C.*  
17 *§§ 502(b)(9) and 105(a), Fed. R. Bankr. P. 2002, 3003(c)(3), 5005, and 9007, and L.B.R. 3003-1*  
18 *for Order (I) Establishing Deadline for Filing Proofs of Claim, (II) Establishing the Form and*  
19 *Manner of Notice Thereof, and (III) Approving Procedures for Providing Notice of Bar Date and*  
20 *Other Information to All Creditors and Potential Creditors* [Dkt. No. 1784] (the “**Bar Date**  
21 **Motion**”), which is set for a hearing before the Court at 9:30 a.m. on June 11, 2019. Any  
22 response or opposition to the Bar Date Motion is due by 4:00 p.m. (Pacific Time) on May 28,  
23 2019.

24 B. Counsel for the California State Agencies has requested, and counsel for the  
25 Debtors has agreed, that the time for the California State Agencies to respond to the Bar Date  
26 Motion be extended.

1           **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**  
2           **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**  
3           **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**  
4           **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**  
5           **THAT:**

6           1.       The time for the California State Agencies to file and serve any response or  
7           opposition to the Bar Date Motion is extended through 4:00 p.m. (Pacific Time) on May 31, 2019.

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*[Signatures on next page]*

1 Dated: May 29, 2019

2 KELLER & BENVENUTTI LLP

3 /s/ Jane Kim

4 Jane Kim

5 *Attorneys for Debtors*  
6 *and Debtors in Possession*

7  
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9 *Attorney General of California*  
10 DANETTE VALDEZ  
11 *Supervising Deputy Attorney General*

12 FELDERSTEIN FITZGERALD  
13 WILLOUGHBY & PASCUZZI LLP

14 /s/ Paul J. Pascuzzi

15 Paul J. Pascuzzi  
16 FELDERSTEIN FITZGERALD  
17 WILLOUGHBY & PASCUZZI LLP

18 *Attorneys for California Department of*  
19 *Toxic Substances Control, California*  
20 *Department of Water Resources acting by*  
21 *and through the California Energy*  
22 *Resources Scheduling Division and on*  
23 *behalf of the State Water Project, State*  
24 *Water Resources Control Board, Regional*  
25 *Water Quality Control Boards, State*  
26 *Energy Resources Conservation and*  
27 *Development Commission, California*  
28 *Department of Forestry and Fire*  
*Protection (CAL FIRE), California Coastal*  
*Commission, California Air Resources*  
*Board, Department of Parks and*  
*Recreation, San Francisco Bay*  
*Conservation and Development*  
*Commission, Department of Housing and*  
*Community Development, Central Valley*  
*Flood Protection Board, and California*  
*Department of Fish and Wildlife*